

### REMARKS

The specification has been amended to include priority data. Support for new claim 14 can be found, for example, in original claim 9. Support for new claim 15 and 16 can be found, for example, in original claim 7. Support for new claim 17 and 18 can be found, for example, in original claim 6.

#### Rejections under 35 USC§ 112 and 101

The claims have been rejected under 35 U.S.C. §112 and § 101. The claims have been placed in a format more customary to US patent practice. It is believed that the amendment to the claims render the rejection moot.

Accordingly, it is submitted that the rejection under 35 U.S.C. §112 should be withdrawn, and the same is respectfully requested.

#### Rejections under 35 USC 102

Claims 10 and 11 stand rejected under 35 U.S.C. §102 as allegedly being anticipated by Pavlenko et al. It is believed that the amendments to the claims render the rejection moot.

Thus, it is respectfully requested that the rejection under 35 U.S.C. §102 be withdrawn.

#### Rejections under 35 USC §103

Claims 1-9 stand rejected under 35 U.S.C. §103 as allegedly being unpatentable over Kovaleva et al.

At page 4 of the Office Action, the Examiner alleges that Kovaleva teaches a process for preparing perfluoralkylphosphinic acids. This is not correct. Kovaleva teaches a process for the preparation of perfluoralkyl**phosphonates** by using NaOH. Kovaleva is silent regarding a process for preparation of bis(perfluoralkyl)**phosphinic** acids or salts using HF.

The compounds prepared are different and thus, nothing in Kavaleva would suggest the present invention or motivate a skilled worker to arrive at the present invention.

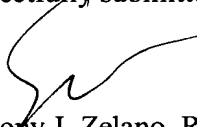
Thus, it is respectfully requested that the rejection under 35 U.S.C. §103 be withdrawn.

**Information Disclosure Statement**

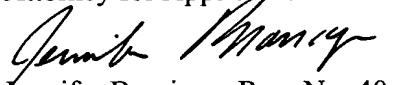
Applicants note the Notice of Acceptance of Application under 35 U.S.C. §371 and 37 C.F.R §1.495, which indicates receipt of the Information Disclosure Statement. Applicants will forward copies of all references that were not forwarded by the International Search Authority.

The Commissioner is hereby authorized to charge any fees associated with this response or credit any overpayment to Deposit Account No. 13-3402.

Respectfully submitted,



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